


JOSEPH R. GOODWIN
UNITED STATES DISTRICT JUDGE

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: C.R. BARD, INC., PELVIC REPAIR
SYSTEM PRODUCTS LIABILITY LITIGATION

MDL NO. 2187

IN RE: AMERICAN MEDICAL SYSTEMS, INC.
PELVIC REPAIR SYSTEMS PRODUCTS
LIABILITY LITIGATION

MDL No. 2325

IN RE: BOSTON SCIENTIFIC CORP., PELVIC
REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION

MDL No. 2326

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM
PRODUCTS LIABILITY LITIGATION

MDL No. 2327

IN RE: COLOPLAST CORP., PELVIC REPAIR
SYSTEM PRODUCTS LIABILITY LITIGATION

MDL No. 2387

IN RE: COOK MEDICAL, INC, PELVIC REPAIR
SYSTEM PRODUCTS LIABILITY LITIGATION

MDL No. 2440

IN RE NEOMEDIC PELVIC REPAIR SYSTEM
PRODUCT LIABILITY LITIGATION

MDL No. 2511

This Document Relates To All Cases

**MOTION TO EXCEED PAGE LIMIT FOR COMMON BENEFIT FEE AND COST
COMMITTEE’S REPLY IN SUPPORT OF PETITION FOR AN AWARD OF
COMMON BENEFIT ATTORNEYS’ FEES AND EXPENSES
AND MEMORANDUM IN SUPPORT**

The undersigned members of the Common Benefit Fee and Cost Committee (“FCC”), move the Court pursuant to Local Rule 7.1(a)(2) for leave to exceed the page limit specified under said Rule for their Reply in Support of Petition for an Award of Common Benefit Attorneys’ Fees and Expenses and Memorandum in Support, and show as follows:

The FCC acknowledges the admonition of the Court’s Local Rule 7.1(a)(2) that motions to exceed page limitations are disfavored and will be denied without a showing of good cause. Plaintiffs respectfully submit that good cause exists here in light of the import of the scope and import of the issues for all related MDLs. The FCC’s Petition for an Award of Common Benefit Attorneys’ Fees and Expenses and Memorandum in Support sets forth the factual and legal basis for compensation for the common benefit work performed from the outset of this litigation. A Response in Opposition has been filed to the FCC’s Petition which asserts a number of arguments, which the FCC is compelled to refute.

Based on the foregoing, and for good cause shown, the FCC respectfully moves the Court for leave to exceed the Court’s page limitation to file its Reply in Support of Petition for an Award of Common Benefit Attorneys’ Fees and Expenses and Memorandum in Support not to exceed thirty (30) pages.

Dated: November 30, 2018

Respectfully submitted,

THE COMMON BENEFIT FEE AND COST COMMITTEE

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